Superior Quality Emission Testing.

Valid Results Guaranteed.

Air Compliance Testing, Inc.

Cleveland, Ohio and Gainesville, Florida
1-800-EPA-AIR1 www.aircomp.com

October 6, 2010

Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

To Whom It May Concern:

This letter accompanies the attached Intent to Test (ITT) Notification Form that we have completed on the behalf of our client, Clow Water Systems Company, located in Coshocton, OH. The purpose of this emissions testing project is to satisfy the testing terms and conditions outlined in the McWane Consent Decree Appendix 3 Section III

The scope of this testing project is to measure Total Front-Half Particulate Matter (PM) using EPA Method 5 from the Cupola Emission System (P901) at the Scrubber Exhaust Stack during Maximum Achievable Operations.

As is written in this ITT, a date of **November 18, 2010** has been selected as the test day with testing equipment set-up occurring on the day before. Typically Run No. 1's start time is targeted for 7:00 am. If this start time changes, Air Compliance Testing or facility personnel will contact you in advance to notify you of the new starting time.

If you have any questions regarding the scope of this testing project, the scheduled test day, or the process(es) being tested, please don't hesitate to call Heather Klesch of Clow Water Systems Company at 740-291-1087, or myself, and we would be happy to assist you in any way possible.

Sincerely,

Air Compliance Testing, Inc.

By:_____
Tyson E. Houchin
Operations Director

cc: Heather Klesch, Clow Water Systems Company
Jeet Radia, McWane, Inc.
Kim Reinbold, Ohio EPA – SEDO, DAPC
Robert A. Kaplan - USEPA Region 5

INTENT TO TEST NOTIFICATION (One Emissions Unit Per Sheet)

Agency use only	
Date Received	
Assigned	

Facility Premise No. 0616010006

Emissions Unit PTI No. PSD Permit No. 06-07432

SCC Number 30400301

Proposed Test Date November 18, 2010

Proposed Start Time 7:00 am

A. Facility Contact Information:

Name: Clow Water Systems Company
Address: PO Box 6001, Coshocton OH 43812-6001
Contact Person: Heather Klesch
Telephone (O): 740-291-1087 (Cell) 740-502-0577
E-Mail: heather.klesch@clowwater.com

Testing Firm Information:

Name: Air Compliance Testing, Inc.
Address: PO Box 41156, Cleveland OH 44141-0156
Contact Person: Tyson E. Houchin
Telephone (O): 216 525-0900 (Cell) 440-821-7805
E-Mail: tyson@aircomp.com

B. Test Location Information

Name: Clow Water Systems Co.
Contact Person: Heather Klesch

Address: S Sixth St, Coshocton OH 43812
Telephone (O): 740-291-1087 (Cell) 740-502-0577

C. Test Plan and Emissions Unit Information Table: List the applicable information under each respective column heading.

Emission Unit	StackID	Test Location	Control Equipment	Monitoring Equipment	Pollutant(s) to be Tested	EPA Test Method	Number of Sampling Points	Total Time per Test Run (min)	Number of Sampling Runs
Cupola Emission System (P901)	A	Scrubber System Exhaust Stack	Scrubber System	Pressure Drop	Sample and Velocity Traverses	1	N/A	15	1
					Stack Gas Velocity and Volumetric Flow Rate	2	24	60	3
					Dry Molecular Weight	3 - Fyrite	24	60	3
					Moisture Content	4	24	60	3
					Total Front-Half Particulate Matter	5	24	60	3

Are *any* modifications or alternatives as spelled within the test methods being proposed? Yes [ ] No [X] If "no", then no modifications or alternatives, however minor, will be accepted. If yes, list each test method and section being modified, and attach a detailed modification description and justification.

Source is testing to comply with (check all that apply): McWane Consent Decree Appendix 3 Section III

D. What is the maximum rated capacity or throughput of the emissions unit given its permit-to-install or permit-to-operate? 85 Tons / hour

Has the facility scheduled production or throughput so that the emissions unit can be operated at the maximum capacity given its permit-to-install or permit-to-operate during the test? Yes [X] No [ ]

Specify how the operating rate will be demonstrated during the testing: Normal facility process and recordkeeping procedures

Sampling Location(s): Inlet [ ] Outlet [X] Simultaneous [ ]

Will cyclonic flow check(s) be conducted? Yes [ ] No [X] Measured during previous test event

Fuel Sampling: Coal-Proximate [ ] Ultimate [ ] Other [X] If other specify: N/A

Emission Rate to be calculated using: F-Factor [ ] Ultimate Coal Analysis [ ] Other [X] If other specify: As dictated by EPA Method 5 calculation algorithms in terms of lb/hr

Has any maintenance or parts replacement been performed on the emissions unit or the control equipment within the last year? Yes [X] No [ ] Preventative Maintenance

(Note: Some maintenance, such as installing new filter bags in a baghouse, or replacing the activated carbon in an adsorber, may disqualify the emissions unit from a performance test until a sufficient amount of time has elapsed to ensure a test which will be representative of normal operations.)

E. Sample Train Calibration: All affected measuring and monitoring equipment should be calibrated within 60 days of the scheduled testing.

THE FOLLOWING ADDITIONAL INFORMATION SHALL BE SUBMITTED AS ATTACHMENTS:

F. Sample Train Information:

1. A schematic diagram of each sampling train.
2. The type or types of capture media to be used to collect each gas stream pollutant. (include filter specification sheets)
3. Sample tube type, (e.g., glass, teflon, stainless steel, etc.)
4. Probe cleaning method and solvent to be used, if applicable.

1. See attached sample train diagram.
2. Type or types of capture media: M3 - Fyrite: The Fyrite analyzer utilizes a chromium chloride-zinc chloride-hydrochloric acid solution for O2 absorption and a potassium hydroxide solution for CO2 absorption. M4: Samples are condensed in H2O and adsorbed onto Silica Gel. M5: Samples are collected on Glass Filter (filter specification sheets attached).
3. Sample tube type: M3 - Fyrite: borosilicate glass or stainless steel with connecting borosilicate glassware. M4: borosilicate glass or stainless steel with connecting borosilicate glassware. M5: Probe liner is borosilicate glass or stainless steel with a borosilicate glass or stainless steel nozzle.
4. Probe cleaning method and solvent to be used: M1: N/A M2: N/A M3 - Fyrite: N/A M4: N/A M5: Reagent Grade Acetone.

G. Laboratory Analysis:

A description of the laboratory analysis methods to be used to determine the concentration of each pollutant.
M3 - Fyrite: A Fyrite analyzer will be used for the analysis in a manner consistent with manufacturer's specifications. M4: A gas sample is extracted at a constant rate (or isokinetically in conjunction with other methods) from the source; moisture is removed from the sample stream and determined either volumetrically or gravimetrically. M5: The analysis for Particulate Matter (PM) will be a gravimetric analysis.

H. Description of Operations:

- A description of any operation, process, or activity that could vent exhaust gases to the stack being tested. This shall include the description and feed rate of all materials capable of producing pollutant emissions used in each separate operation. Maximum process weight rate, or coating rate, and parameters such as line speed, VOC content etc. should be specifically documented with calculations to confirm worst case scenario emissions.

Note 1: All compliance demonstration testing shall be performed at maximum rate capacity as specified by the equipment manufacturer or at the maximum rate actually used in the emissions unit operation, whichever is greater, or at any other rate as agreed upon with Ohio EPA.

Note 2: If the emissions unit is not operated at maximum capacity, or as close as possible thereto, the emissions unit might be derated to the production capacity achieved during the test.

The only operations, processes, and/or activities that could vent exhaust gases to the test stack are those described above in this document.

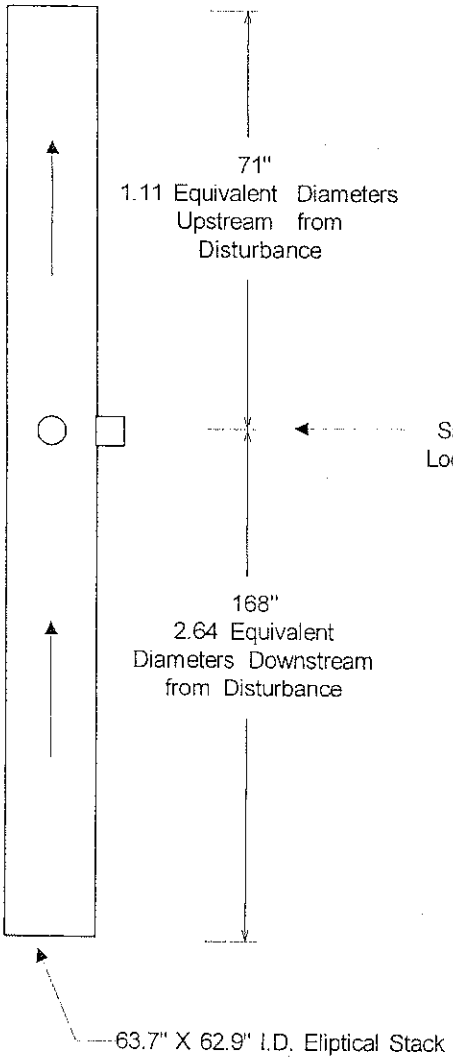
I. Stack and Vent Description:

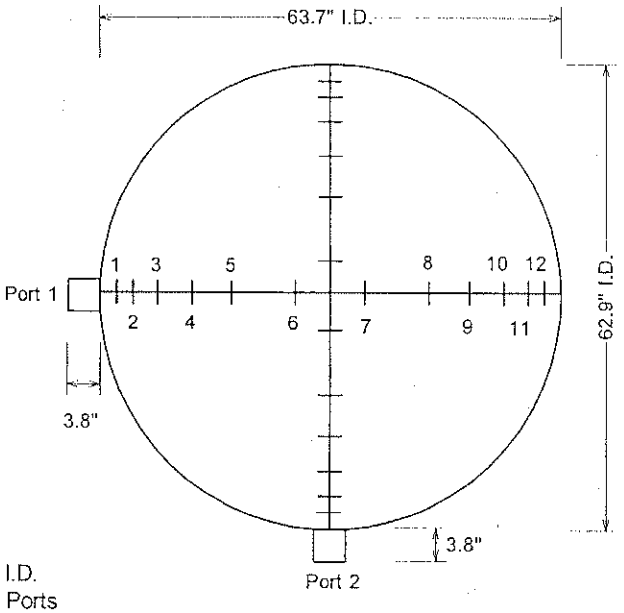
- A dimensional sketch or sketches showing the plan and elevation view of the entire ducting and stack arrangement. The sketch should include the relative position of all processes or operations venting to the stack or vent to be tested. It should also include the position of the ports relative to the nearest upstream and downstream gas flow disturbance or duct dimensional change. The sketches should include the relative position, type, and manufacturer's claimed efficiency of all gas cleaning equipment.
- A cross sectional dimensional sketch of the stack or duct at the sampling ports, showing the position of sampling points. In case of a rectangular duct, show division of duct into equal areas.
- For Fugitive emissions testing, a sketch illustrating the specific emissions points to be observed must be included.

See attached stack drawings.

J. Safety:

Describe all possible safety hazards including such items as the presence of toxic fumes, high noise levels, areas where eye protection is required, etc. Note: Conditions considered unsafe at the time of the test will cause postponement.
The Plant requires the use of safety glasses, safety shoes, hard hats, and hearing protection (in designated areas). At this time, and to the best of our belief and knowledge, there are no toxic fumes or other hazards expected to be on site at this facility that would cause you to formally prepare for your exposure to them. It is our recommendation however, to consult plant personnel regarding its safety policies before accessing the production areas on this site. Air Compliance Testing personnel will be required to wear safety shoes and safety glasses at all times while on site at the facility to comply with our own company policy.





(2) 3.0" I.D.
Sampling Ports
Located 90°Apart

Point	% of Duct Depth	Distance From Inside Wall (in.) Port 1	Distance From Inside Wall (in.) Port 2
1	2.1	1.3	1.3
2	6.7	4.3	4.2
3	11.8	7.5	7.4
4	17.7	11.3	11.1
5	25.0	15.9	15.7
6	35.6	22.7	22.4
7	64.4	41.0	40.5
8	75.0	47.8	47.2
9	82.3	52.4	51.8
10	88.2	56.2	55.5
11	93.3	59.4	58.7
12	97.9	62.4	61.6

NOTES:
1. Not to scale
2. Dimensions subject to change upon verification.

No.	Revisions	Date	By
0	For Approval	8/26/03	SHC

Air Compliance Testing, Inc.
P.O. Box 41156
Cleveland, Ohio 44141
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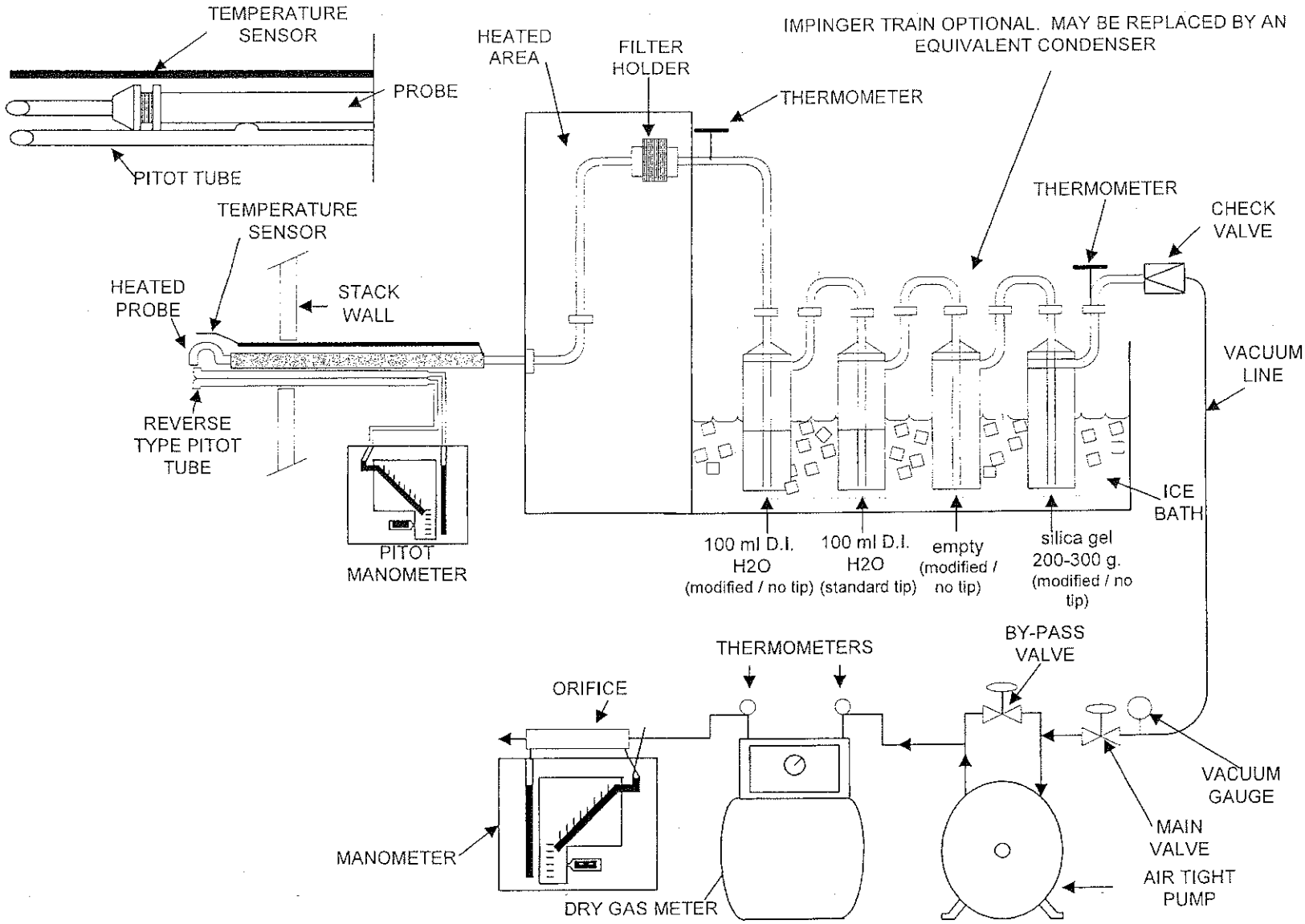
Phone: (800) 372-2471 Fax: (216) 525-0901

Scrubber Exhaust Traverse Point Schematic

Clow Water Systems
Coshocton, Ohio

Dwg. No.



NOTES:
1. Not to scale

No.	Revisions	Date	By
0	For Approval	4/19/04	JM

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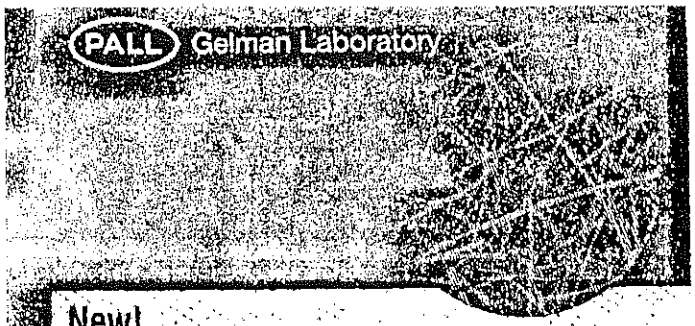
EPA Method 5 Sample Train Schematic

Dwg. No.



New!

Pallflex® Filters

Wide range of filters uniquely suited for a broad range of air monitoring applications.

- Can be used for high temperature and hot gas air monitoring applications.

Applications

Tissuquartz™ Filters

- Heat treated for reduction of trace organics and superior chemical purity.
- High temperature use for analysis of acidic gases and stack sampling aerosols.
- High flow rate and filtration efficiency.
- Ultra-pure soft water processing to reduce residual ion content. Contact us for typical values.

Fiberfilm™ Filters

- Fiberfilm is well suited for a broad range of air sampling applications.
- Moisture variations in air or gases during air sampling will not cause chemical reactions on the filter.
- Heat-treated (HT) version available for reduction of trace organics.

Emfab™ Filters

- Withstands folding for weighing and transport.
- Every filter flushed with DI water to remove any water-soluble residue.
- Low air resistance for use in critical aerosol sampling tests such as diesel exhaust.

Complementary Products

For other products related to these applications see:

In-line Holders.....172-174
Open-face Holders.....175

Specifications

Description	Tissuquartz	Emfab	Fiberfilm
Filter Media	Pure quartz, no binder	Borosilicate microfibers reinforced with woven glass cloth and bonded with PTFE	Heat resistant borosilicate glass fiber coated with fluorocarbon (TFE)
Diameter	25 - 90 mm (and 8 x 10 in.)	12 - 142 mm (and 8 x 10 in.)	25 - 100 mm (and 8 x 10 in.)
Typical Thickness	432 µm (17 mils)	178 µm (7 mils)	203 µm (8 mils)
Typical Filter Weight	5.8 mg/cm^2	5.0 mg/cm^2	3.4 mg/cm^2
Typical Water Flow Rate at 0.35 bar (5 psi)	220 mL/min/cm^2	32 mL/min/cm^2	220 mL/min/cm^2
Typical Air Flow Rate at 0.7 bar (10 psi)	73 L/min/cm^2	68 L/min/cm^2	180 L/min/cm^2
Maximum Operating Temperature – Air	1093 °C (2000 °F)	260 °C (500 °F)	315.5 °C (600 °F)
Typical Aerosol Retention*	99.9%	99.9%	96.4%
pH in Boiled Water Extract	6.5 - 7.5	Not available	Not available

**Following ASTM D 2986-71 0.3 µm (DOP) at 32 L/min/100 cm^2 filter media*